REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 29-40 are pending in the present application, 1, 3-11, and 13-28 having been canceled without prejudice or disclaimer, and Claims 29-40 having been added. Applicants respectfully submit that support for new Claims 29-40 is self-evident from the originally filed disclosure.[1] Applicants respectfully submit that no new matter is added.

In the outstanding Office Action, the figures where objected to; the specification was objected to; Claims 1 and 3-11 were rejected under 35 U.S.C. §112, first paragraph; Claims 1 and 3-11 were rejected under 35 U.S.C. §112, second paragraph; Claims 1, 4-5, and 8-10 were rejected under 35 U.S.C. §103(a) as unpatentable over Geradts et al., *Methods for Identification of Images Acquired with Digital Cameras* (hereinafter Geradts) in view of Kalker (U.S. Patent No. 6,477,431); Claim 3 was rejected under 35 U.S.C. §103(a) as unpatentable over Geradts in view of Kalker, and further in view of Schipper (U.S. Patent No. 5,764,770); Claims 6 and 7 were rejected under 35 U.S.C. §103(a) as unpatentable over Geradts in view of Kalker, and further in view of Chen et al., *Symmetric Phase Only Matched Filtering of Fourier-Mellin Transforms* (hereinafter Chen); and Claims 11 was rejected under 35 U.S.C. §103(a) as unpatentable over Kurosawa et al., *CCD Fingerprint Method-Identification of a Video Camera from Videotaped Images* (hereinafter Kurosawa) in view of Chen and Kalker.

With respect to the objection to the title, a new title is provided. Further, Applicants note that MPEP § 2106 states,

> Whenever practicable, Office personnel should indicate how rejections may be overcome and how problems may be resolved. A failure to follow this approach can lead to unnecessary delays in the prosecution of the application.

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[1] See, for example, page 24, lines 12-29; Fig. 3; and Fig. 5, for example.

In view of the cancellation of Claims 1-28, Applicants respectfully submit that the remaining grounds of rejection and objection are moot.

Further, Applicants note that the Request For Information is responded to on a separate sheet.

Applicants respectfully submit that Claim 29 recites novel features neither disclosed nor rendered obvious by the applied art. Claim 29 recites, *inter alia*, "a correlation detection unit configured to detect variations in strength of different light receiving elements." The art of record does not disclose or suggest these elements of Claim 29.

Geradts states "We have looked into different methods of examining the cameras to determine if a specific image has been made with a camera; **defects in CCDs, file formats that are used, noise introduced by the pixel arrays and watermarking in images used by the camera manufacturer**" (emphasis added).[2] Thus, Geradts is concerned with defects in CCDS. This is different than what is described in Claim 29.

In Claim 29, a correlation detection section detects variations in strength of different light receiving elements. As discussed in the specification, each light receiving element has an aperture that varies in shape. Thus, there is a variation in the shape of the light striking the light receiving elements. For example, the amount of light striking the photo-electric conversion region of the silicon substrate 12 varies and, therefore, the light receiving sensitivity varies depending on the light receiving element.

Geradts compares a pattern of defective CCD elements, and is not concerned with the variations in strength of the light that impinges on the light receiving elements. In Geradts, there is no analysis regarding the amount of light that impinges on a working CCD element or a defective CCD element. The only analysis is based on whether the CCD element is defective or not.

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[2] Geradts, abstract.

Thus, Geradts does not disclose or suggest the claimed "a correlation detection unit configured to detect variations in strength of different light receiving elements."

Kalker pertains to watermark detection. There is no disclosure or suggestion of the claimed "a correlation detection unit configured to detect variations in strength of different light receiving elements."

Chen describes a two-dimensional matching technique based on the symmetric phase-only matched filtering of the Fourier-Mellin invariant descriptors of the images. There is no disclosure or suggestion of the claimed "a correlation detection unit configured to detect variations in strength of different light receiving elements."

Schipper describes a digital camera that conceals image authentication information concerning the circumstances of formation of the digital image of a selected view within the image itself. The image authentication information includes location information and/or angular orientation information and/or information on time of image formation and/or distance from the digital camera to a selected object in a viewfinder of the camera. The image authentication information is encoded into an image by individually altering pixels to contain parts of the authentication information. Authentication of the image is provided by comparing the position information contained in the digital image with position information that is stored elsewhere. There is no disclosure or suggestion of the claimed "a correlation detection unit configured to detect variations in strength of different light receiving elements."

Kurosawa describes a CCD fingerprint method that based on non-uniformity of dark currents on CCD chips, which causes a fixed pattern noise. Fixed pattern noise that disturbs a CCD is caused by the nonuniformity of dark current. The dark current arises from thermal energy within the inverse-biased pn junction, and ***which is independent of light falling on the sensor***.

In Claim 29, a correlation detection section detects variations in strength of different light receiving elements. As discussed in the specification, each light receiving element has an aperture that varies in shape. Thus, there is a variation in the shape of the light striking the light receiving elements. For example, the amount of light striking the photo-electric conversion region of the silicon substrate 12 varies and, therefore, the light receiving sensitivity varies depending on the light receiving element.

Kurosawa compares a pattern of dark currents to determine if an image was recorded by a particular camera. In Kurosawa, there is no analysis regarding the amount of light that impinges on a working CCD element or a defective CCD element. The only analysis is based on whether the CCD element is defective or not.

Thus, Kurosawa does not disclose or suggest the claimed "a correlation detection unit configured to detect variations in strength of different light receiving elements."

In view of the above-noted distinctions, Applicants respectfully submit that Claim 29 (and any claims dependent thereon) patentably distinguish over Schipper, Geradts, Chen, and Kurosawa, taken alone or in proper combination. Applicants respectfully submit that Claim 35 recites elements analogous to those of amended Claim 29. Applicants respectfully submit that Claim 35 patentably distinguishes over Schipper, Geradts, Chen, and Kurosawa, taken alone or in proper combination, for at least the reasons stated for Claim 29.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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